

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**ADRIA J. McLAUGHLIN**

**Plaintiff,**

**Case No.: 1:21-cv-1298**

**v.**

**State Court Case No.: C-13-CV-21-000195**

**TARGET CORPORATION,**

**Defendant.**

\* \* \* \* \*

**NOTICE OF REMOVAL**

Defendant, Target Corporation (“Target”), by its attorneys, Daniel R. Lanier, Susan DuMont and Miles & Stockbridge P.C., gives notice to this Court pursuant to 28 U.S.C. Section 1441, et seq. that it is removing the above-captioned case, State Court Case No.: C-13-CV-21-000195 from the Circuit Court for Howard County. In support of its action to remove, Target states:

**INTRODUCTION**

1. On or about March 8, 2021, Plaintiff, Adria J. McLaughlin filed an action against Target in the Circuit Court for Howard County entitled Adria J. McLaughlin v. Target Corporation, Case No.: C-13-CV-21-000195.

2. Target was served on or about April 29, 2021 with a Writ of Summons and a Complaint. A copy of the Writ of Summons and Complaint are attached as Exhibit A.

3. This Notice of Removal is being filed within thirty (30) days after service upon Target of a copy of the Complaint and Summons, and is timely filed under 28 U.S.C. Section 1446(b).

4. A Notice of Filing of Notice of Removal has been filed with the Circuit Court for Howard County contemporaneously herewith. A copy of that Notice is attached as Exhibit B.

**FACTS AND LAW SUPPORTING REMOVAL**

5. Plaintiff is a resident of the State of Maryland.

6. Defendant Target is a Minnesota corporation with its principal place of business in Minnesota.

7. The amount in controversy in this matter exceeds the sum of Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

8. There is complete diversity of citizenship among the parties and this Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. Section 1332. Further, none of the parties joined and served as a defendant is a citizen of Maryland.

9. Pursuant to 28 U.S.C. Section 1446(a), true and legible copies of all process, pleadings, papers, and Orders which have been served upon Target in this matter are attached as Exhibit A.

**WHEREFORE**, Defendant, Target Corporation, respectfully requests, based upon the allegations of this Notice of Removal, that this action is properly removable and requests that this court retain jurisdiction over the same.

Respectfully submitted,

/s/ Daniel R. Lanier

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*Attorneys for Defendant,  
Target Corporation*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26<sup>th</sup> day of May, 2021, a copy of the foregoing **NOTICE OF REMOVAL** was mailed first-class, postage prepaid, to:

Joel G. Fradin  
Nottingham Center – Suite 730  
502 Washington Avenue  
Towson, Maryland 21204

Maxwell R. Collins, II  
606 Baltimore Avenue, Suite 306  
Towson, Maryland 21204-4085

*Attorneys for Plaintiff*

/s/ Daniel R. Lanier

Daniel R. Lanier